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First name: Amy

Last name: Stuart

Organization:

Title:

Comments: Dear US Department of Agriculture and US Department of Interior

Re: Comments in support of the 80 year age minimum for protections of mature and old growth trees.

Dear Sirs,

My husband and I appreciate the opportunity to comment on the effort you have begun to address President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. We strongly support protecting our remaining mature and old-growth forests. It is a simple and cost-effective climate policy solution that the US can implement at a landscape scale to address climate change impacts. We are urgently concerned, given the twin crises of climate change and biodiversity that our country has created with our overconsumption of fossil fuels and other natural resources. Climate change is becoming exponentially worse contributing to wildfires, floods, hurricanes, and excessive heat. It is critically important that you immediately fulfill the President's directive to permanent protections for these trees.

We support a definition of a minimum of 80 years and older to protect large, mature trees from harvest. We also support a minimum size of diameter at breast height staningdard such as restoring the 21 inch Eastside Screens rule that protected large old trees on almost 10 million acres on forests in Eastern Oregon for the past 30 years, that the previous administration removed through illegal means. Federal land management agencies must establish and restore protection standards for the ecological and carbon benefits older forests provide. Older, mature and big trees store huge amounts of carbon in federal forests and continue to sequester carbon at high rates. For example, research scientists have shown that our Eastern Oregon forests over 21 inches in diameter compromise only 3% of the remaining timber (historically over 75%) and store 42% of the carbon. The 6 forests east of the Cascade Mountains are implementing huge timber sales that will log large quantities of our remaining mature and old growth timber to the detriment of carbon storage and our native fish and wildlife species such as ESA listed salmon and steelhead.

Large, mature and old growth forests occur across diverse landscapes and forest types and provide essential habitat and biodiversity benefits for numerous native fish and wildlife species. They also provide soil and nutrient recycling and are important sources of water for aquatic habitats and downstream communities. We urge you to protect mature forests and trees today that provide the basis to recover old-growth ecosystems, largely lost to timber harvest over the last 80 years.

Without a minimum age protection, continued timber harvest of mature and old growth trees will further exacerbate the loss of biodiversity and climate change impacts. Climate change cientists such as Drs. David Mildrexler, Beverly Law and Dominick DellaSala have writtent numerous scientific articles on the need to protect large old trees on federally managed forests since logging is a major source of carbon dioxide emissions to the atmosphere that is greater than emission from wildfires.

We are also concerned that the recent USDA Secretarial Memorandum stated that "A primary threat to old-growth stands on national forests is no longer timber harvesting, but rather catastrophic wildfire and other disturbances resulting from the combination of climate change and past fire exclusion". This statement is a flagrant, alarming and inaccurate assessment of threats to mature and old-growth forests. The numerous proposed and timber sales being implemented across our region target mature and old-growth trees, under the blatant disguise of "restoration", "hazardous fuels reduction" and "wildfire mitigation." This overt misuse of science is just plain wrong and must stop immediately.

Thousands of acres of mature and old-growth federal forests in eastern Oregon are proposed and currently being harvested even in roadless areas that have never been logged. Mature and old growth trees and roadless areas still retain pristine elements in support of fish and wildlife species and store carbon far beyond what young trees can do. We urge the federal land management agencies to adopt the new science and STOP logging mature and old growth trees. A minimum 80 year leaves options to manage for ecologically appropriate risk reduction of uncharacteristic wildfire, which is very dominantly driven by small trees and shrubs, not our big, fire-resistant trees that have survived for, in some cases, hundreds of years.

In summary, we ask you, the US Department of Agriculture and US Department of Interior, to urgently begin rulemaking based on a definition of mature forests and trees as 80 years and older, and permanently end the loss of these amazing trees due to logging, of the many values that they provide such as important carbon storage and sequestration, clean water, and fish and wildlife habitat.

Sincerely,

Amy Stuart, retired fish and wildlife biologist

Mike Gerdes, retired wildlife biologist